

June 14, 2024

Re: Raanan v. Binance Holdings Limited, et al., No. 24 Civ. 00697 (JGK) (S.D.N.Y.)

Dear Judge Koeltl:

Pursuant to Section I.E of Your Honor's Individual Practices, Defendants Binance Holdings Limited and Changpeng Zhao (together, the "Defendants") and Plaintiffs write jointly to respectfully request that the Initial Conference scheduled for July 2, 2024 at 2:30 p.m. be adjourned, pending the Court's decision on Defendants' forthcoming Motion to Dismiss. Section II.A of Your Honor's Individual Practices directs the parties "to confer with each other pursuant to Rule 26(f) of the Federal Rules of Civil Procedure before the initial conference with the Court" and "to provide a Rule 26(f) report to the Court before the initial conference." The parties have conferred and respectfully submit that a Rule 26(f) report would be premature given the parties have entered, and the Court has so-ordered, a Stipulation under which "[d]iscovery relating to Plaintiffs' claims against the Stipulating Defendants shall be stayed pending resolution of the Stipulating Defendants' motion(s) to dismiss the operative complaint in this action." (ECF No. 12). The Court also entered an order providing that Defendants' dismissal motion will be fully briefed on or before August 2, 2024. (ECF No. 16). This is the parties' first request for an adjournment, and it does not affect any other scheduled dates. The parties have met and conferred regarding the scope of this request.

We appreciate Your Honor's time and attention to this matter.

Respectfully submitted,

/s/ Amiad Kushner

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VIA ECF

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